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*Via ECF*

October 18, 2021

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:** Rafael Almanzar v. Enterprise Gold Street Parking LLC, et al.  
Case No. 21-cv-06672

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Dear Judge Cronan:

As counsel for Defendants Enterprise Gold Street Parking LLC (“Gold Street”) and World Tower Parking Garage, LLC (“World Tower”) (together, “Defendants”) in the above-referenced matter, we respectfully write jointly with Plaintiff to request an adjournment of the Initial Pretrial Conference currently scheduled for October 25, 2021 at 11 AM and a corresponding extension of associated deadlines for the initial conference-related submissions. The Parties have engaged in limited pre-discovery exchanges of documents and information. Plaintiff has provided Defendants a draft stipulation for conditional collective certification which has given rise to a dispute between the Parties over the proposed scope of such certification and of Plaintiff’s claims. In order to resolve this dispute, the Parties have agreed to engage in further informal document exchange in advance of mediation, which will be rescheduled shortly. The Parties believe that it is important to resolve this issue before attending mediation or continuing the litigation process, as it may ultimately save the Parties and the Court from motion practice in connection with potential collective certification as well as facilitate meaningful and informed settlement discussions between the Parties.

**JacksonLewis**

Honorable John P. Cronan  
October 18, 2021  
United States Southern District Court of New York  
Page 2

Thank you for Your Honor's attention to this matter.


Respectfully submitted,



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4845-0651-9807, v. 3

These requests are granted. The Initial Pretrial Conference currently scheduled for October 25, 2021 is adjourned until November 12, 2021 at 11:00 a.m. By November 5, 2021, the parties shall file a proposed case management plan, scheduling order, and status letter.

SO ORDERED.  
Date: October 19, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge